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March 6, 2015

VIA ECF

The Honorable Sidney H. Stein
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

**Re: Dedra De La Rosa v. BTM Development Partners, LLC and Related
Management Co., L.P., Docket No. 14-cv-2444(SHS)(RLE)**

Dear Judge Stein:

The parties write jointly to update the Court on the status of the above- referenced matter.

Following a series of written exchanges, in-person conferences and the joint inspection of Defendants' property per the Court order of January 14, 2015, the parties have narrowed the issues in dispute and made progress towards resolving this case. The remaining items fall into limited areas of disagreement which the parties will attempt to resolve with the schedule detailed below.

Specifically, the following has occurred since our last conference before the Court:

- On January 21, 2015, Plaintiff provided Defendants with its Response to Defendants' Expert Report.
- On February 2, 2015, Defendants provided its Reply to Plaintiff's Response. On February 13, 2015, the parties met in person with their experts.
- On February 18, 2015, the parties participated in a joint re-inspection of the Bronx Terminal Market with their experts.
- On February 25, 2015, Defendants provided Plaintiff with a joint inspection report.
- On March 4, 2015, the parties met in person with their experts to discuss the joint inspection report and the remaining issues in the case.

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Despite the parties' progress, there is additional and necessary follow up work. Specifically, Defendants will provide Plaintiff with a revised Expert Report/Settlement Proposal by March 13, 2015. Plaintiff will thereafter respond to the revised Expert Report/Settlement Proposal by March 27, 2015. In order for the parties to have sufficient time to continue the work toward trying to resolve this action without engaging in immediate litigation due to the March 31, 2015 deadline to complete discovery, the parties respectfully request the Court to extend the time for the completion of discovery from March 31, 2015 to April 30, 2015.

Thank you for your consideration in this matter.

Respectfully,

/s/ Eve I. Klein

Eve I. Klein

EIK/jb

cc: Glen H. Parker, Esq. (via ECF)